

The Honorable John C. Coughenour

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

CYNQUE DARON JONES-ADAMS,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES
LLC and TRANS UNION LLC,

Defendant.

Case No. 2:24-cv-01836-JCC

**~~PROPOSED~~ DEFENDANT EQUIFAX
INFORMATION SERVICES, LLC'S
UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

NOTED ON MOTION CALENDAR:
Same Day Motion

Defendant Equifax Information Services LLC ("Equifax"), by their attorneys and pursuant to Local Rules 7 and 10 of the Western District of Washington, hereby submits this Unopposed Motion for an Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint. In support of its motion, Equifax states as follows:

1. On September 30, 2024, Plaintiff Cynque Daron Jones-Adams filed a Complaint in the Superior Court of Washington for King County. (ECF No. 1-2)

2. Equifax was served via process service on its registered agent, Corporation Service Company, on October 18, 2024.

3. On November 7, 2024, Defendant Trans Union LLC timely removed this matter to the United States District Court for the Western District of Washington. (ECF No. 1)

4. Pursuant to Rule 81(c) Federal Rule of Civil Procedure, Equifax must file its responsive pleading by November 14, 2024.

5. On November 13, 2024, counsel for Equifax conferred with Pro Se Plaintiff to confirm that she had no objection to extending Equifax's deadline to answer or respond to Plaintiff's Complaint. Plaintiff consents to Equifax's requested extension.

6. Thus, to allow Equifax additional time to investigate Plaintiff's allegations and to engage in informal settlement discussions with Pro Se Plaintiff, Equifax respectfully requests an extension of time to answer or otherwise respond to Plaintiff's Complaint through and including November 21, 2024.

7. This motion is filed before Equifax's response to Plaintiff's Complaint is due. Equifax's request is not sought for the purpose of delay, nor will the additional time adversely affect the just, speedy, and inexpensive determination of this action. *See* Fed. R. Civ. P. 1.

8. This motion is filed in good faith and is supported by good cause.

WHEREFORE, Equifax respectfully requests the Court to issue an Order extending the time for Equifax to answer or otherwise respond to Plaintiff's Complaint through and including November 21, 2024.

Respectfully submitted this November 14, 2024.

SEYFARTH SHAW LLP

By: /s/Andrew R. Escobar

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*Counsel for Defendant
Equifax Information Services LLC*

1 IT IS SO ORDERED.

2 Dated this 14th day of November, 2024.

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A handwritten signature in black ink, reading "John C. Coughenour", is written over a horizontal line.

THE HONORABLE JOHN C. COUGHENOUR
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2024, I presented the foregoing EQUIFAX INFORMATION SERVICE'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

A copy has also been sent via U.S. Mail to the following:

Cynque Daron Jones-Adams, *plaintiff pro se*
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/s/ Andrew R. Escobar
Andrew R. Escobar
Counsel for Defendant
Equifax Information Services LLC